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ATTORNEYS FOR HEALTHTECH  
MANAGEMENT SERVICES, INC.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

POWELL VALLEY HEALTH CARE, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
HEALTHTECH MANAGEMENT SERVICES, INC.,	)	Civil Action No. 12-CV-0042-F
	)	
Defendant/Crossclaimant,	)	
	)	
v.	)	
	)	
PAUL CARDWELL and MICHAEL J. PLAKE,	)	
	)	
Defendants/Cross Defendants.	)	

**AMENDED NOTICE OF VIDEO RECORDED DEPOSITION DUCES TECUM OF  
DEFENDANT/CROSS DEFENDANT PLAKE**

Please take note that counsel for Defendant/Crossclaimant HealthTech Management Services, Inc., will take the following videotaped deposition via Holland & Hart videoconference on the date and at the time indicated below at the offices of Holland & Hart, 2515 Warren Avenue, Suite 450, Cheyenne, WY 82001; (307) 778-4200:

<b>DEPONENT</b>	<b>DATE</b>	<b>TIME</b>
Michael Plake	May 7, 2013	9:00 am.

The deposition will be taken before a certified court reporter and notary public and will continue from day to day until completed. The deposition will be video recorded via the Holland & Hart videoconference system and will be taken in accordance with the Federal Rules of Civil Procedure and may be used for all purposes as provided by the rules.

Defendant/CrossDefendant Plake is requested to bring the documents identified on the attached Exhibit A.

DATED: May 2, 2013.

/s/ Bradley T. Cave

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ATTORNEYS FOR CROSS-PLAINTIFF  
HEALTHTECH MANAGEMENT SERVICES, INC.

### **CERTIFICATE OF SERVICE**

I hereby certify that on May 2, 2013, I served a true and correct copy of the foregoing by

CM/ECF addressed to the following:

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/s/ Bradley T. Cave

**EXHIBIT A – DOCUMENTS TO BE PRODUCED**

In accordance with the definitions and instructions set forth below, please produce each and every document in your possession, custody or control falling into any one or more of the following categories at the time of your scheduled deposition:

1. Any and all documents constituting or reflecting text messages sent to, or received from, Paul D. Cardwell or anyone acting on his behalf, from August 25, 2012 until the present.
2. Any and all documents constituting or reflecting emails sent to, or received from, Paul D. Cardwell or anyone acting on his behalf, from August 25, 2012 until the present.
3. Any and all documents constituting or reflecting any Facebook or other social media posting or communication made by Paul D. Cardwell, from March 7, 2011 until the present.
4. Any and all documents constituting or reflecting any Facebook or other social media posting referring to Paul D. Cardwell, from March 7, 2011 to the present.
5. Any and all documents constituting or reflecting any written or oral communications of any kind from Paul D. Cardwell or anyone acting on his behalf, from August 25, 2012 until the present.
6. Any and all documents reflecting the transfer of any property (including money or any other form of assets) or of any interest in property with a value of \$1,000 or more, from or to Paul D. Cardwell or anyone acting on his behalf, from March 7, 2011 until the present.
7. Any and all documents reflecting any purchases or other financial transactions undertaken on behalf of Paul D. Cardwell or anyone acting on his behalf, from August 25, 2012 until the present.
8. Any and all documents indicating, suggesting or providing evidence as to the whereabouts of Paul D. Cardwell at any time from August 25, 2012 until the present.
9. Any and all documents reflecting the incoming or outgoing phone numbers for any phone calls you made, or which were made to you, from August 25, 2012 until the present.

**DEFINITIONS**

For purposes of the above requests, the following definitions and instructions apply and are incorporated into each request as though fully stated therein:

The term "document" is as defined in Rule 34 (a) of the Federal Rules of Procedure and Rule 1001 (1) of the Federal Rules of Evidence as follows: any designated documents or electronically

stored information – including writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations – stored in any medium from which information can be obtained either directly or, if necessary, after translation by the responding party into a reasonably usable form; or any designated tangible things.

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